

THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHRISTOPHER J. HADNAGY, an individual;
and SOCIAL-ENGINEER, LLC, a
Pennsylvania limited liability company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON
COMMUNICATIONS, INC., a Washington
corporation; and DOES 1-10; and ROE
ENTITIES 1-10, inclusive,

Defendants.

No. 2:23-cv-01932-BAT

**DECLARATION OF CHRISTOPHER
HADNAGY IN SUPPORT OF
PLAINTIFFS' MOTION FOR CIVIL
CONTEMPT AND SANCTIONS**

Noted for Consideration: March 24, 2025

ORAL ARGUMENT REQUESTED

I, Christopher Hadnagy, declare under penalty of perjury under the laws of Washington State as follows:

1. I am one of the Plaintiffs in this case and the CEO of Social-Engineer, LLC.
2. On February 21, 2025, Defendants filed a Motion for Summary Judgment, accompanied by an exhibit file containing 779 pages. Within that exhibit, Defendants publicly disclosed multiple pieces of information that were explicitly designated as Confidential under the protective order governing this case. Specifically, they disclosed:

- 1 • A detailed list of my company's clients, including the dollar amounts of their contracts.
- 2 • My personal salary information for the years 2019 through 2024.
- 3 • The names of my medical providers along with information regarding my treatment.
- 4

5 3. Social-Engineer, LLC provides sensitive security consulting services to Fortune
6 500 companies, government agencies, and other organizations worldwide. Our business
7 relationships are governed by strict non-disclosure agreements (NDAs), and we do not publicly
8 disclose the identities of our clients, the nature of our services, or the amounts they pay us.
9 Unauthorized exposure of Social Engineer's clients poses severe security risks and makes them
10 vulnerable to malicious actors.

11 4. Defendants' public disclosure of our confidential client information poses an
12 immediate and severe risk to my company. Such exposure could lead to clients terminating their
13 relationships with us, as they may no longer trust us to protect their confidentiality. This disclosure
14 jeopardizes our business and threatens the very survival of the company, which is already
15 struggling as Defendants are well aware of. Publicly revealing our client names and contract
16 amounts directly undermines our efforts to rebuild trust and restore lost business.

17 5. The disclosure of my personal salary information is also a severe invasion of my
18 privacy and deeply distressing. My financial history was not previously public and reveals personal
19 financial struggles. If I seek new employment, this disclosure will negatively impact my ability to
20 negotiate salary with future employers. Additionally, by exposing my financial difficulties,
21 Defendants have provided further ammunition for online harassment and ridicule. Needless to say,
22 this has caused me significant distress.

23

1 6. Defendants also disclosed the names of my medical providers along with details of
2 my medical treatment. I consider this an egregious violation of my medical privacy, causing me
3 further humiliation and embarrassment.

4 7. I have already suffered significant fear due to Defendants' public transparency
5 reports, including receiving death threats and witnessing my family—my wife, son, and
6 daughter—being subjected to harassment. Recently, I received an email containing threats that
7 directly reference my medical and financial information therein. Attached hereto as **Exhibit A** is
8 a true and correct copy of an email titled 'Outed. Don't show your face,' dated March 1, 2025.

9 8. Learning that others now have access to my private medical information, including
10 the identities of my healthcare providers, has intensified my anxiety immeasurably. Due to this
11 prior harassment, I even felt compelled to warn my medical provider that her name had been
12 disclosed in this litigation, as I fear she too may now be targeted.

13
14 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF
15 WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

16
17 DATED this 3rd day of March 2025, in Orlando, Florida.

18
19
20 By: 

21 Christopher Hadnagy
22
23

CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury according to the laws of the United States and the State of Washington that on this date I caused to be served in the manner noted below a copy of this document entitled **DECLARATION OF CHRISTOPHER HADNAGY IN SUPPORT OF PLAINTIFFS' MOTION FOR CIVIL CONTEMPT AND SANCTIONS** on the following individuals:

David Perez, WSBA #43959
Matthew J. Mertens (Pro Hac Vice)
Lauren A. Trambley (Pro Hac Vice)
Jacob (Jake) Dean (Pro Hac Vice)
Perkins Coie LLP
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☐ Via USPS
☒ Via Electronic Mail
☒ Via Electronic Filing (CM/ECF)

DATED this 3rd day of March 2025 at Seattle, Washington.



Amber Holmes, Legal Assistant

Exhibit A

From: nulln0de@tutamail.com
Sent: Saturday, March 1, 2025 10:28 AM
To: [Christopher Hadnagy](#)
Subject: Outed. Don't show your face

You don't often get email from nulln0de@tutamail.com. [Learn why this is important](#)

I have attended your village for many years and always touted how your the nice guy, leave everyone happier or some shit. But then reading your court docs posted by def con you are filthy. I can't believe I actually believed in your utter bullshit.

I am glad you are depressed and I am glad you are on meds, you don't deserve peace and happiness with how you treat women. You are disgusting

You should never show your face at any con, and if you do we will treat you as you treated your victims.

The way you talk to your own son. You filthy disgusting piece of shit.

One more question you twat If you are only making 9k a year how are you affording all this? I bet you've been stealing from ILF... Your worse than a child rapist

Piece of shit